

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

(1) JIMMY L. HUFF, II,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:20-cv-00659-TCK-JFJ
)	
(1) TIME LOGISTICS, INC., an Illinois)	
corporation, a/k/a OLD BRIDGE,)	
(2) MILE MILOSAVLJEVIC,)	
(3) PREDRAG MARIC, and)	
(4) OLIVERA ANTONIJEVIC,)	
)	
Defendants.)	

COMPLAINT
(JURY TRIAL DEMANDED)

COMES NOW the Plaintiff, JIMMY L. HUFF, II by and through his attorney of record, James F. Self, Jr. of Self & Associates, Inc., and for his cause of action against the Defendants, TIME LOGISTICS, INC., MILE MILOSAVLJEVIC, PREDRAG MARIC and OLIVERA ANTONIJEVIC, alleges and states as follows, to-wit:

1. Plaintiff is an individual and citizen of the State of Oklahoma.
2. Defendant, TIME LOGISTICS, INC., is a foreign corporation organized and existing under the laws of the State of Illinois with its principle place of business in a state other than Oklahoma, but at all times material to this action, doing business in the State of Oklahoma.
3. Defendant, MILE MILOSAVLJEVIC, is an individual and upon information and belief a resident of Chicago, Illinois and/or a resident of the country of Canada.

4. Defendant, PREDRAG MARIC, is an individual and resident of the State of Illinois and was the President and owner of Defendant TIME LOGISTICS, INC. on February 1, 2020.

5. Defendant, OLIVERA ANTONIJEVIC, is an individual and resident of the State of Illinois and upon information and belief was the Vice President and owner of Defendant TIME LOGISTICS, INC. on February 1, 2020 and is now the current President of TIME LOGISTICS, INC.

6. The occurrence which is the subject matter of this litigation occurred in Ottawa County, Oklahoma.

7. This court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 because the parties have diverse citizenship, the cause of action arose in Ottawa County, Oklahoma, and the amount in controversy exceeds the sum of Seventy Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

8. On or about the 1st day of February, 2020, the Plaintiff, JIMMY L. HUFF, II, a State of Oklahoma resident, was driving a semi-truck and trailer driving westbound and had stopped in the outside lane on Interstate 44 (Will Rogers Turnpike) near the City of Miami, Ottawa County, Oklahoma. A semi-truck and trailer being driven by the Defendant, MILE MILOSAVLJEVIC, was also travelling westbound on the same Interstate 44, travelling at an excessive and unsafe speed and collided with the semi-truck and trailer driven by the Plaintiff, JIMMY L. HUFF, II. Said collision causing severe personal injuries to the Plaintiff.

9. At the time and place of the collision, the semi-truck Defendant, MILE MILOSAVLJEVIC was driving, was operating under D.O.T. number 3012455 registered to TIME LOGISTICS, INC., Elk Grove Villa, Illinois 60007.

10. At the time and place of said collision, MILE MILOSAVLJEVIC, upon information and belief, was a resident of the State of Illinois, and/or the country of Canada, and was the agent, servant or employee of TIME LOGISTICS, INC.

11. Plaintiff's injuries were the direct and proximate result of the negligence of MILE MILOSAVLJEVIC, individually and as the agent, servant and/or employee of TIME LOGISTICS, INC. as follows:

a. The Defendant, MILE MILOSAVLJEVIC, failed to maintain a proper lookout for other traffic;

b. The Defendant, MILE MILOSAVLJEVIC, failed to devote his full time and attention to his driving;

c. The Defendant, MILE MILOSAVLJEVIC, recklessly failed to use his brakes and other mechanical means available to avoid the collision;

d. The Defendant, MILE MILOSAVLJEVIC, was recklessly travelling at an unsafe speed for road conditions without regard to other traffic including the Plaintiff;

e. The Defendant, MILE MILOSAVLJEVIC, was an inattentive driver and was distracted causing the collision; and

f. That the Defendants, PREDRAG MARIC and OLIVERA ANTONIJEVIC, exercised significant power and control over TIME LOGISTICS, INC. and MILE

MILOSAVLJEVIC on February 1, 2020, and prior thereto including the employment and training of MILE MILOSAVLJEVIC.

12. That Defendants, TIME LOGISTICS, INC., and/or PREDRAG MARIC and OLIVERA ANTONIJEVIC, negligently hired, screened, retained, trained, instructed or adequately insured, the Defendant, MILE MILOSAVLJEVIC, with regard to the operation of its motor vehicle and his required compliance with both state and federal laws including the FMCSA regulations. Defendant, TIME LOGISTICS, INC., and/or PREDRAG MARIC and OLIVERA ANTONIJEVIC, therefore negligently entrusted their vehicle to the Defendant, MILE MILOSAVLJEVIC, and were individually negligent in contributing to the cause of the collision and Plaintiff's injuries.

13. That the actions of Defendants, TIME LOGISTICS, INC., MILE MILOSAVLJEVIC, and/or PREDRAG MARIC and OLIVERA ANTONIJEVIC, were intentional, willful, wanton, grossly negligent and reckless, without regard to the safety of the community as a whole and/or JIMMY L. HUFF, II in particular. Said actions entitle Plaintiff to an award of punitive damages.

14. As a result of the Defendants' negligence the Plaintiff, JIMMY L. HUFF, II, suffered serious physical injuries, said injuries are permanent, painful and progressive. As a result of said injuries, Plaintiff has incurred and will incur future medical expenses; lost wages; his earning capacity has been reduced; he has endured and will endure both physical and mental pain and suffering; will be permanently disabled/impaired and disfigured and he has been damaged in an aggregate sum in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiff, JIMMY L. HUFF, II, prays judgment against the Defendants herein, in an amount in excess of \$75,000.00 together with interest and costs in this action. Plaintiff further prays judgment for punitive damages against the Defendants herein, in an amount in excess of \$75,000.00, together with interest and costs in this action.

Respectfully submitted,

/s/ James F. Self, Jr.

James F. Self, Jr. OBA #8063
SELF & ASSOCIATES, INC.
8720 S. Pennsylvania Avenue, #A
Oklahoma City, OK 73159
Telephone: (405) 685-2111
Facsimile: (405) 685-2189
jself@aol.com; jo.selflaw@yahoo.com
Attorney for Plaintiff,
JIMMY L. HUFF, II

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